

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)	
)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:16-cv-00769-HTW-LRA
)	
DANNY’S RESTAURANT, LLC AND DANNY’S OF JACKSON, LLC F/K/A BABY O’S RESTAURANT, INC D/B/A DANNY’S DOWNTOWN CABARET)	
)	
)	
Defendants.)	

**PLAINTIFF UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION’S MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY**

Plaintiff, United States Equal Employment Opportunity Commission (“EEOC” or “Plaintiff”), respectfully moves for summary judgment as to liability on the claims asserted by the EEOC in its Complaint against Danny’s of Jackson, LLC (“Defendant”). EEOC is entitled to this relief for the reasons set forth more fully in its Memorandum of Law in Support of Motion for Summary Judgment as to Liability, filed contemporaneously with this motion, and the following evidentiary exhibits attached hereto:

Exhibit A: Def. Amended Resp. to EEOC Interrog. No. 11

Exhibit B: Declaration of Adrea Samuel, dated February 5, 2018

Exhibit C: Excerpts from deposition of Michael Rayner, dated October 25, 2017

Exhibit D: Excerpts from deposition of Brittany Rayner, dated September 20, 2017

Exhibit E: Declaration of Sharday Moss, dated January 31, 2018

Exhibit F: Excerpts from deposition of Alison Wade, dated October 13, 2017

Exhibit G: Excerpts from 30(b)(6) deposition of Danny's of Jackson,
dated January 19, 2018

Exhibit H: Sherida Edwards' EEOC Charge of Discrimination

Exhibit I: EEOC Letter of Determination, dated April 24, 2012

Exhibit J: Ashley Williams' EEOC Charge of Discrimination

Exhibit K: Affidavit of Dax Owens, dated January 18, 2018

Exhibit L: Declaration of Mike Farrell, Esq., dated January 24, 2018

Exhibit M: EEOC Letter of Determination, dated June 6, 2016

Exhibit N: Declaration of Latoria Garner, dated January 31, 2018

Exhibit O: Photo of cash register at Danny's Downtown

Exhibit P: Declaration of Ashley Williams, dated February 5, 2018

Exhibit Q: Declaration of Jordyn Riddle, dated January 31, 2018

Date: February 6, 2018

/s/Alysia D. Franklin

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**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION**

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2018, I filed the foregoing with the Clerk of Court using the CM/ECF system which will electronically send notification of the filing to all attorneys of record.

/s/Alysia Franklin
Alysia Franklin